

Data Validation Report

TDD No: 09-04-01-0011
PAN: 001275.0440.01TA
Site: El Dorado Hills
Laboratory: Lab/Cor, Inc.
Reviewer: Denise A. Shepperd, Trillium, Inc.
Date: January 28, 2005

I. Case Summary

SAMPLE INFORMATION:

Asbestos Samples: APG-L2-13CH-100404; APG-L2-1CH-100404; APG-L2-1ZB-100404; APG-L2-2CH-100404; APG-L2-3CH-100404; APG-L2-4CH-100404; APG-L2-5CH-100404; CC1-L6-1CA-100204; CC1-L6-1CB-100204; CC1-L6-2CB-100204; CC1-L6-3CB-100204; CC2A-L6-1CA-100304; CC2-L6-11CC-100304; CC2-L6-1CC-100304; CC2-L6-2CC-100304; CC2-L6-3CC-100304; CC2-L6-4CC-100304; SVBA-H2-1FD-100204; SVBA-H2-2FD-100204; SVBA-H2-3FD-100204; SVBB-H2-1FD-100304; SVBB-H2-2FD-100304; SVBB-H2-3FD-100304; TPG-L2-11CH-100404; TPG-L2-1CH-100404; TPG-L2-1ZB-100404; TPG-L2-2CH-100404; TPG-L2-3CH-100404; TPG-L2-4CH-100404; TPG-L2-5CH-100404; RHB-H2-1FD-100304; RHB-H2-2FD-100304; RHB-H2-3FD-100304; RHB-L2-1CH-100304; RHB-L2-2CH-100304; RHB-L2-3CH-100304; RHB-L2-4CH-100304; RHB-L2-5CH-100304; SVBA-L2-11CH-100204; SVBA-L2-1CH-100204; SVBA-L2-2CH-100204; SVBA-L2-3CH-100204; SVBA-L2-4CH-100204; SVBA-L2-5CH-100204; SVBB-L2-12CH-100304; SVBB-L2-1CH-100304; SVBB-L2-2CH-100304; SVBB-L2-3CH-100304; SVBB-L2-4CH-100304; SVBB-L2-5CH-100304; SVM-H2-1FD-100204; SVM-H2-2FD-100204; SVM-H2-3FD-100204

Matrix: 53 Air samples

Analysis: Asbestos by Transmission Electron Microscopy

Collection Dates: October 2 through 4, 2004

Sample Receipt Date: October 7, 2004

Analysis Date: October 7 through November 22, 2004

Analytical Method: ISO Method 10312

FIELD QC:

Field Trip Blanks (TB): APG-L2-1ZB-100404
Filter Blanks (FB): None
Equipment Blanks (EB): None
Background Samples (BG): None

Field Duplicates (D1): Not Identified

TABLES:

- 1A: Analytical Results with Qualifications
- 1B: Data Qualifier Definitions for Inorganic Data Review

SAMPLING ISSUES:

Five chain of custody (COC) documents were included in the data package and were properly completed. These documents included all of the field samples in the data package, as well as many additional samples.

VALIDATION PARAMETERS AND COMMENTS:

I. Holding Times, Preservation and Sample Integrity

This parameter is evaluated to ensure that sample custody is documented from collection through analysis, samples are analyzed within the recommended holding time, and that no alteration in sample content has occurred during sample shipment, handling, and storage.

There is no established holding time or storage condition for asbestos samples.

II. Calibration

The analyses of materials of known content ensures that identification and quantitation of analytes will be accurate for all samples. Review of the documentation provided for appropriate calibration determines whether or not the analytical results reported by the laboratory are valid and supported by the data.

The data deliverables for this project were included in multiple data packages. The calibration documentation was provided in a single package associated with all of the site sample data packages.

A letter representing documentation of an NVLAP laboratory site assessment conducted on 11/7/03 was included in the data package. The letter included (dated 5/10/04) indicated that the laboratory met the on-site assessment requirements.

Results and evaluator notes and tables were included for an NISTIR 5351 analysis of an inter-laboratory QC sample. The laboratory's raw data were compiled and assessed by Batta Labs. Analysts were identified by initials and included all of the initials documented with this sample set, except "JH." According to the assessor's notes, the sample included chrysotile fibers and structures and the laboratory's results were within NVLAP and NISTIR 5351 acceptance limits. No raw data were provided for this QC sample.

Results for a New York State Department of Health Environmental Laboratory Approval Program proficiency test, conducted between 9/7/04 and 11/9/04, were included. The proficiency samples included asbestos in air. The laboratory's results were satisfactory for all four of the air sample categories. Actinolite and amosite fiber types were identified and counts were acceptable according to the data sheet. No raw data were provided for this proficiency sample. Upon request, the laboratory provided raw data documenting the identification of actinolite and amosite asbestos on 1/27/05. These data were inserted into the QC data package by the validator.

Acceptable instrument calibration was documented in the data package, including screen and camera magnification, camera length and camera constant, spot size, k-factor, beam dose, EDS sensitivity and peak intensity. No documentation of grid opening size was provided. Documentation was provided in the separate proficiency and calibration data package for October through December, 2004, for both of the instruments used for analysis of

samples included in this data package. Analyses of the samples in this data set were performed during this time period.

Based on the fact that the laboratory demonstrated proficiency in the performance evaluation (PE) analyses performed in the third quarter of 2004, and that these PE samples included the two predominant asbestos types detected in this field sample set, no action was taken by the validator. It is recommended however, that supporting data be expanded to include raw data supporting the identification of all asbestos types detected in PE samples and demonstration, wherever possible, of the correct identification (in known reference materials) of all fiber types detected in a field sample set.

III. Blanks

Sample matrices known to be devoid of the analytes of interest (method blanks) are prepared and analyzed with each analytical batch. Evaluation of this parameter ensures that contamination introduced during preparation and analyses is not attributed to the field samples.

Other blanks may be generated in the field or laboratory to ensure that no contamination is introduced during sampling and/or storage.

Blanks required for this project included Filter Blanks and Field Trip Blanks. No filter blanks were included with this sample set; two Field Trip Blanks (APG-L2-1ZB-100404 and TPG-L2-1ZB-100404) were included. Field Trip Blanks are processed and analyzed by the laboratory in the same manner as field samples. Results can be used to assess contamination from a combination of the field and the laboratory environments. No asbestos structures were identified in either of the field blanks.

IV. Spiked Samples

The analytes of interest are added in known concentrations to like-matrix blanks or authentic field samples before preparation. This parameter is evaluated in order to assess the laboratory's ability to preserve and recover the compounds of interest.

The analytical method does not require laboratory spiked sample analyses. It is recommended by the validator that some type of laboratory prepared or purchased spiked analyses be performed with each analytical sample batch.

The project requirements specified that results from the most recent inter-laboratory study would be acceptable as an LCS sample for these data. This requirement was met by the laboratory and reported results for the inter-laboratory study sample were acceptable for all air sample parameters (see Section I).

V. Duplicate/Replicate Samples

Results for duplicate/replicate samples are evaluated to assess the laboratory's precision for the analytes of interest in the applicable sample matrix. For asbestos analyses, duplicate and replicate measurements take the form of a combination of variables which include the preparation of the grid, the choice of grid openings to be analyzed, and the analyst performing the counting and identification of structures.

The laboratory included all of the QC samples from all of the field sample sets in a separate data package under a separate report number.

The two analysts, JH and TM, not represented in the PE sample analyses included with the data packages for this project did perform intra-laboratory replicate and duplicate analyses on associated field samples. Results for these QC analyses for both analysts were within the sample-specific acceptance limits.

The quality assurance project plan (QAPP) requires five types of laboratory duplicate/replicate analyses, each to be performed at a rate of 5% (one for every twenty) of the field samples. Based on 50 field samples reported in the data package, two or more of each of these QC sample pairs were required. The laboratory compared the primary asbestos structure count for each of the QC samples prepared and analyzed. Results for all of the duplicate/replicate pair types were evaluated based on 95% confidence limits determined from the original sample count result. Results for all of the reported QC samples were within the laboratory's calculated limits. A summary of the laboratory QC samples included with this data set are as follows:

Replicate analyses:

- one sample, SVM-H2-2FD-100204, was analyzed as a replicate wherein a different preparation was analyzed by the same analyst;

Duplicate analyses:

- SVM-H2-2FD-100204 was also analyzed as a duplicate wherein the same grid openings were recounted by a different analyst;
- Three samples, RHB-H2-2FD-100304, SVM-H2-1FD-100204, and SVM-H2-2FD-100204, were both analyzed as duplicates, wherein different grid openings were selected for counting by a different analyst; and
- One sample, RHB-H2-3FD-100304 was analyzed as the third type of duplicate specified by the QAPP, wherein a different analyst analyzes a different preparation.

No samples were analyzed as QC samples for one of the required categories:

- a replicate wherein different grid openings were selected by the same analyst for a second measurement

Two samples should have been included for each of these QC sample categories in order to satisfy the 5% requirements of the QAPP.

An additional type of QC sample not identified by the QAPP was included. Two samples (RHB-H2-2FD-100304 and RHB-H2-3FD-100304) were recounted by the same analyst counting the same grids.

The laboratory indicated on the QC sample summary sheet that an additional sample from this analytical batch was included as one replicate and two duplicate analyses. The replicate analysis was a new preparation and the duplicate analyses were performed on the same and different grid openings, however, it is not possible to determine the original analyst from the documentation provided. The primary structure count for the original sample analysis was recorded on the QC summary sheet, however. There was good agreement between the results reported on the QC summary sheet for the four analyses (original and 3 QC samples) of this sample.

According to the QAPP provided with the data packages, field duplicates were required at a rate of 10% of field samples. Field duplicate pairs were not identified or evaluated as part of this validation effort.

VI. Identification

Identification of asbestos structures and fibers is dependent on sample preparation techniques, analyst training, instrument operation, and data interpretation. Comparison with results from known standards is used to evaluate the accuracy of the structure identification for field samples.

Actinolite, chrysotile, amosite, anthophyllite, wincherite, tremolite, and edenite were identified in the field samples. According to the report forms provided in the QC package, the laboratory correctly identified actinolite, chrysotile, and amosite in PE sample analyses performed in the third quarter of 2004. Comparison of identification between the various analysts, grid opening, and preparations combinations that make up the daily QC for these analyses were acceptable. Therefore; based on the documentation provided, fiber and structure identifications for chrysotile, amosite, and actinolite were determined to be valid as reported. It was assumed that the laboratory correctly identified the other structures that were reported in the field samples.

VII. Quantitation and Reported Detection Limits

Raw data documentation is reviewed to ensure that all reported results and detection limits are correctly calculated, accurately reported, and supported by the raw data.

Results for asbestos categories, fiber density, and detection limits were correctly calculated and accurately reported by the laboratory. Results were verified by the validator using the information included on the reporting forms and the chain of custody records.

Results from the analyses of three field samples (APG-L2-13CH-100404, APG-L2-1CH-100404, and CC1-L6-3CB-100204) were rejected by the laboratory due to overloading of the filters and were not reported with this data set.

VIII. System Performance

This parameter is evaluated to ensure that the laboratory analytical systems were functioning properly at the time of analyses and that methodology appropriate to the analyses were followed.

The analytical systems appear to have been working satisfactorily and to have been calibrated properly at the time of these analyses, based on the available documentation.

IX. Documentation

Data and documentation completeness is critical in providing support for the reported results. Problems encountered with the nature or quality of the data package documentation are addressed.

No raw data were provided in the data package for the proficiency samples analyzed in support of the laboratory's accreditation. Raw data to support the identification of actinolite and amosite were received upon request on 1/26/05.

Raw data for chrysotile fibers were not included in the data package for review. Raw data documenting fiber identification for the other asbestos types identified in the field samples were present in the data package. Upon request, negatives and EDS for selected field samples were received from the laboratory on 1/27/05.

Count sheets included in the data package are computer generated forms. No date of the actual count is presented on these forms. If there is a corresponding bench sheet from which these forms are prepared, these should be supplied as a part of the data package. It is recommended that analyst's initials and date of count be added to the documentation.

The legend for the count sheets, which defines the codes used for the structure counts lists PSCH as the code for protocol chrysotile structures. The code appearing on the count sheets for this category is PCAS.

On the printouts for the EDS for some of the field samples the analysis date listed is Jan 1, 1997.

Raw data are an integral part of a complete and defensible data package. Edits made on all data should be performed correctly. Proper editing requires drawing a single line through the incorrect information, adding the correct information, and initialing and dating the changes.

Asbestos structures identified in the field samples included actinolite, chrysotile, amosite, anthophyllite, winchellite, tremolite, and edenite. Examples of known materials included in the data package in support of the sample analyses included only actinolite, chrysotile, and amosite, identified in the proficiency sample analyses. No raw data were provided for the proficiency sample analyses. Based on the documentation provided, the identification of the other fiber types in a known standard was not documented.

COMMENTS:

- A. The EDS #552 was not listed on the count sheet for sample APG-L2-4CH-100404. The validator added this entry to the count sheet for the sample.

ADDITIONAL COMMENTS:

Based on the available data, results for all of the samples included in this data set were determined to be valid as reported by the laboratory. Reported results, analytical sensitivity, and detection limits are considered to be accurate within the bounds of the 95% confidence limits determined for each sample. No qualifiers were applied to these data by the validator.

The data results tables included as Table 1A include only the primary and total asbestos structure counts. Counts for individual categories required by the project Scope of Work are presented in the associated electronic data deliverables (EDD) tables.

This report was prepared according to the specifications of the analytical method, ISO Method 10312 “Ambient air - Determination of asbestos fibres - Direct-transfer transmission electron microscopy method,” the document “USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review,” 2/94, and Trillium, Inc.’s SOP No. 0497-06A, for Validation of Analytical Data: Inorganic Analytes.

TABLE 1B

DATA QUALIFIER DEFINITIONS FOR INORGANIC DATA REVIEW

The definitions of the following qualifiers are prepared in accordance with the document, "USEPA Contract Laboratory Program National Functional Guidelines for Inorganic Data Review," 2/94.

- U The analyte was analyzed for, but was not detected above the level of the reported value. The reported value is either the sample quantitation limit or the sample detection limit.
- L Indicates results which fall between the sample detection limit and the CRDL. Results are estimated and are considered qualitatively acceptable but quantitatively unreliable due to uncertainties in the analytical precision near the limit of detection.
- J The associated value is an estimated quantity. The analyte was analyzed for and was positively identified, but the reported numerical value may not be consistent with the amount actually present in the environmental sample.
- R The data are unusable. The analyte was analyzed for, but the presence or absence of the analyte cannot be verified.
- UJ A combination of the "U" and "J" qualifier. The analyte was analyzed for but was not detected. The reported value is an estimate and may be inaccurate or imprecise.